

Asian Star Company Limited Group Policy

Asian Star Company Ltd and all its group entities (herein after referred to as Asian Star) are committed to the following:

Legislation and Regulations

Asian Star shall adhere to and comply with relevant National and International Rules, Regulations and Legislations as may be applicable from time to time in the countries where it operates.

Money Laundering, Terrorism Financing, other financial offences

Asian Star recognizes the fact that entities in the Gems and Jewellery sector need to take onus of analyzing their potential vulnerabilities towards Money Laundering and implement specific steps that are required for protection against misuse by criminals.

Asian Star ensures strict and proper compliance at all times of all applicable National and, wherever applicable, International Laws / Regulations with respect to Money Laundering, Terrorism Financing, Bribery, Facilitation Payments, Corruption, Smuggling, Embezzlement, Fraud, Racketeering, Transfer Pricing and Tax Evasion.

Asian Star has been undertaking the following steps towards compliance of the applicable laws

Asian Star adhere to appropriate due diligence (OECD) on a risk based approach over our counterparties. Asian Star ensures that appropriate scrutiny and monitoring of transactions is done as risk based approach.

Asian Star takes necessary steps to ensure effective elimination of Money Laundering and Terrorism Financing by prompt reporting of suspicious transactions to the Local Financial Intelligence Unit (FIU).

Kimberley Process and System of Warranties

Asian Star is fully committed towards complying with all the requirements specified in the Kimberley Process Certification Scheme and World Diamond Council's (WDC) System of Warranties Declaration.

Asian Star does not buy/sell goods from/to suspected or unknown parties or the goods that are not supported with the Kimberly Process Certificate and/or declaration of System of Warranties.

Anti-Bribery and Facilitation Payment Policy

Asian Star ensures complete prohibition of Bribery and Facilitation Payment. It does not offer, accept or countenance any payment, gift in kind, hospitality, expense or promises as such that may compromise assurance of fair competition.

Disclosure of Treated Diamonds, Synthetics and Stimulants

The following essential principles are being observed in all the transactions involving treated diamonds, synthetics and stimulants:

- Disclosure of all the available information about a treated diamond, and all treatments it has undergone prior to sale to the purchaser, irrespective of whether or not the information is specifically requested and regardless of the effect on the value of the diamond.

- Not to resort to such language, claims, representations or attempts that may misguide the customers while selling, advertising and distribution of treated diamonds, synthetics and stimulants.

Conflict Minerals Policy Statement (Gold)

Asian Star is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Asian Star seeks to source products, components and materials from companies that share our values about human rights, ethics and environmental responsibility.

We discourage supply from "conflict minerals" originating from the Democratic Republic of the Congo (the "DRC") or adjoining countries. Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups that are responsible for human rights violations.

What is CAHRA's (Conflict Affected High Risk Areas) for Minerals?

The four most commonly mined conflict minerals (known as 3TGs, from their initials) are Cassiterite (for tin), Wolframite (for tungsten), Coltan (for Tantalum) and gold ore, which are extracted from the eastern Congo, and passed through a variety of intermediaries before being purchased. These minerals are essential in the manufacture of a variety of devices, including consumer electronics such as mobile phones, laptops, and MP3 players.

Asian Star strongly recommends the entire suppliers of (Gold & 3T's) not to supply any mineral or metals sourced from above regions.

Asian Star supports industry-wide efforts to identify, reduce and hopefully eliminate the use of conflict minerals originating from the DRC and adjoining countries to the extent believed to be financing or benefiting groups committing human rights violations. Asian Star is committed to complying with any applicable requirements under the Conflict Minerals Rule and has implemented a Due-diligence process to meet its obligations under the legislation.

Supplier's to Asian Star are expected to establish their own conflict minerals policies, Due-diligence frameworks and management systems that are designed to prevent conflict minerals originating from the DRC or an adjoining country, to the extent that they benefit groups committing human rights violations, from being included in the products sold to Asian Star. In the event if Group determines that a supplier has failed to develop and implement reasonable steps to comply with this Policy, Asian Star reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier.

Conflict Minerals Policy Statement (Diamond & Gem Stone)

Asian Star is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Asian Star seeks to source products, components and materials from companies that share our values about human rights, ethics and environmental responsibility.

Asian Star strive to ensure that none of its supplies of diamonds is originating from CHARA's and where practically possible origin of diamonds is known to us.

What are "Conflict Diamonds"?

Blood Diamonds, also known as "**Conflict Diamonds**," are stones that are produced in areas controlled by rebel forces that are opposed to internationally recognized governments. The rebels sell these diamonds, and the money is used for criminal activities and or funding terrorism.

Identified CAHRA'S Affected Diamond Producing Nations:

Sierra Leone, Liberia, Angola, the Republic of Congo, Côte d'Ivoire, the Central African Republic, and the Democratic Republic of Congo.

Asian Star ensure that none of its supplies are coming from above sources. Asian Star shall communicate its sourcing policy to all the stakeholders and will ensure effective implementation among them.

Employment

Asian Star ensures compliance of all applicable national and, where appropriate, international laws / regulations with respect to employment.

Asian Star believes in the bonding of management and employees to ensure harmonious work environment.

Health, Safety & Environment

Asian Star is fully committed to the pursuance of applicable standards of health and safety, and the provision of a safe and healthy working environment for all its employees.

Asian Star has identified the applicable health and safety standards as set out in national legislations / regulations, and with due consideration to international standards as set out in ILO Conventions, and ensures compliance of the same.

Asian Star takes responsibility to reduce the environment impact to minimal in all their processes, services and products; to prevent and control any air, water and soil pollution arising out of processes, to reduce wastage and adopt reuse and recycling wherever applicable.

Asian Star is fully committed to the pursuance of applicable laws, regulations and standards of environment.

Non Discrimination, Disciplinary Practices

Asian Star ensures and strongly discourages any form of discrimination related to hiring, discharge, employee emoluments, pay, promotion, training of employees etc. on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, HIV status, migrant status, membership of worker representative bodies, political affiliations or any other criteria that are unlawful.

Child Labour

Asian Star is not engaging any form of child labour such as Illegal and or unacceptable forms of child labour. (Below the age of 14 years)

Forced Labour

Asian Star is fully committed to ensuring that forced or involuntary labour is not practiced in any form at any of its facilities.

The following definitions will be applicable:

- The Universal Declaration of Human Rights that states that 'No one shall be held in slavery or servitude.
- ILO Convention 29, which defines forced or compulsory labour as 'all work or service which is extracted from any person under the menace of any penalty, and for which the said person has not offered himself voluntarily'.

Human Rights

Asian Star treats all the employees with equality, respect and dignity.

Asian Star does not interfere in the right of employees to observe tenets or practices based on caste, race, national origin, gender, religion, disability, union membership, or political affiliation.

Direct or indirect physical, sexual, racial, religious, psychological, verbal, or any other form of harassment or abuse, or any other form of intimidation or degrading treatment is not tolerated.

Product Security

Asian Star ensures that all its products are protected from theft, robbery and other associate risks. Product purity, quality and other parameters are monitored at each stage to avoid switch over of the products.

Public Grievances

Asian Star keeping in view of the increasing importance of redressal of public grievances, has introduced the common grievance cell to look in to the matter of reporting noncompliance against any of the company policy or raising red flag against any of its business entity or individual involved in activities which will bring industry in disrepute. Any such matter can communicated to below mentioned members.

Compliance Officer; Mr. Pranav Kapadia

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